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June 15, 2018

The Honorable Kimba Wood
United States District Judge
Southern District of New York
1610 United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *John Rigas & Timothy Rigas v. United States*, 11-CV-6964 (KMW)

As counsel for Petitioners, I write to reluctantly request that, in light of my impending surgery, the Court grant a 10-day extension of the date for filing the Petitioners' Reply Memorandum in this matter. That deadline is currently set for June 29, 2018, and I ask that it be extended to July 9, 2018.

I am the lawyer primarily responsible for authoring the forthcoming memorandum. And I was prepared to complete it in a timely manner under the original June 15 original deadline for the Reply (one week after the government was to have filed its memorandum on June 8). But given the new June 22 deadline for the government's memorandum, it will be impossible for me to complete the reply within seven days of the government's filing. This is because I will be undergoing back surgery on June 18. The surgery is a lumbar fusion, which will involve hospitalization for several days. I am told to expect I will be weak and impaired for a week or two following the surgery.

Although the MoloLamken firm has been retained to handle the discovery in the case, given my eight years of experience with the case and my having drafted all of the substantive petitions and memoranda, I am the one responsible for drafting the forthcoming Reply Memorandum that deals with the ultimate issues of Petitioners' entitlement to relief on their Interference Claims.

I recognize that the Court is reluctant to extend the timetable in the case, but I hope the Court will consider this surgery to be an exigent circumstance justifying a brief extension.

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We have consulted with Assistant United States Attorney Brian Blais, who has indicated that the Government has no objection to this request.

Respectfully,

/s/ Lawrence C. Marshall

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